

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA

vs.

DANNY JO THOMPSON, II,
Defendant

}
CASE NUMBER: 5:21CR20141-
001

}
HON. JUDITH E. LEVY

}
SENTENCING MEMORANDUM

The Defendant, Danny Jo Thompson, by and through his attorney William C. Amadeo, states the following:

Danny understands that he comes before this Honorable Court concerning a serious charge that will have a life altering effect on this young man. With that stated, Danny asks Judge Levy to considering the following when imposing her sentence.

BACKGROUND

Danny Jo Thompson II was born December 30, 1991 to 21-year-old Jennifer Thompson (unmarried) and Adam Enger (a drug-addict who was actually in prison at the time of Danny's birth). After a few years of living in a volatile home and being raised by Jennifer and her abusive, drug-addict boyfriend Adam, Danny was

adopted by Danny Jo Thompson I (Jennifer's father, hereinafter referred to as Dan) and LeeAnn (Lee) Boyer Thompson in 1995.

Dan served in the 25th Infantry Division during the Vietnam War, during which he was exposed to Agent Orange. His children and grandchildren have therefore experienced significant health problems as a consequence. Danny himself has always suffered from skeletal and nerve issues, notably in his back/spine, with chronic back pain and severe sciatica. After serving in the army, Dan was a longtime alcohol, only getting sober from alcohol when he and his wife Lee adopted Danny, the biological son of his youngest daughter Jennifer. His addiction, however, transferred from alcohol to the pain pills he was prescribed for his many health issues. For Danny's entire life with his father, he lived through and witnessed his father's pill addiction (including watching him lick the residue from empty pill bottles).

Due to Dan and Lee's careers with the US Postal Service, Danny's childhood involved continuously moving from city to city and state to state. He never had a very stable home life or a place where he could fully settle in. He lived in Arkansas and numerous locations in Texas but eventually moved back to Michigan. Danny attended Bishop Foley Catholic High School in Madison Heights, Michigan. While Danny was in high school, his father Dan had a heart attack and required triple bypass surgery. At the time, Lee was living in Chicago,

IL due to a USPS work relocation. Danny therefore singlehandedly managed the household and cared for his father, all while maintaining his honor roll status in school, participating in school sports, and working part-time for the Detroit Lions. Meanwhile in Chicago, Lee spent the entirety of her time out of the state of Michigan, had entered into a secret extramarital affair with a male coworker (who is now her husband), and was continuing to distance herself both physically and emotionally from Dan and Danny.

While living in southeast Michigan during his teenage years, Danny often traveled up north to his birth mother's hometown to escape the stress and relationship problems between Dan and Lee and to spend time with his birth mother Jennifer and his two younger half-brothers, Ian and Kenny (Jennifer's sons from two different fathers). Though Jennifer had given up custody of Danny, she still wanted him in her life, just more as a friend and party buddy than as a son. Jennifer introduced Danny to alcohol, to marijuana, and to many other party drugs. She was a "role model" for him during his formative years in the worst way possible, steering him towards the negative and careless type of lifestyle she herself had led (which for her consisted of a string of abusive relationships leading to unplanned pregnancies, as well as an alcohol and drug dependency). Unbeknownst to him, Danny was emotionally manipulated and taken advantage of by an adult woman who was supposed to be a parent figure to him.

INITIAL EDUCATION AND REHABILITATION

After years of navigating his two families and their unique dramas, Danny graduated high school and then started to pursue an education in criminal justice at Macomb Community College. Though he was on track academically, he had developed his own alcohol dependency during this time as a way to cope with the stresses of his life, his family problems, and his resulting abandonment issues. Then at some point during all this, Dan moved back up north to where Jennifer and his other daughter Tammy lived, leaving Danny on his own for the most part. Danny's alcoholism continued and escalated until he was arrested for driving while intoxicated. He got sober right then and there, successfully participated in and completed a 3-month outpatient rehabilitation treatment, and has been sober from alcohol ever since (all with little to no support system).

CARING FOR HIS FATHER

When Dan's health continued to decline (diabetes, pain pill addiction, PTSD, among many other issues), Danny's education was disrupted and he was forced to drop out of college to move up north and once again care for his father - despite Dan's two adult daughters living in the same town as Dan. Danny completely dropped his plans, put aside his goals, uprooted his life, and fell back into the role of caretaker and dependable son (all while being newly sober - he was essentially forced to do all the things you're not supposed to do while in recovery,

namely making big life changes). Though being there for his father was nearly a full-time job itself (going with him to doctor's appointments, running errands and grocery shopping, taking care of the house and yard, etc.), Danny also held a job working for a small landscaping business to have some sort of income of his own.

PERSONAL LIFE

In May 2015, Danny began dating the love of his life, Rachel, who was up north visiting her family after her recent college graduation from the University of Michigan. Danny and Rachel maintained a long-distance relationship for several months, with Rachel living in Ann Arbor and working at U of M during the week, then driving up north on the weekends to spend time with Danny and his father. Very shortly into their relationship, Danny was pulled over and arrested for possession of marijuana. With Dan beginning to depend more and more on his daughters for assistance, this incident was the final push Danny needed to leave the unproductive life he was stuck in up north. He moved down to the Ann Arbor area with Rachel in the fall of 2015, bringing along his cat and small dog.

With Rachel's help and encouragement, Danny immediately began job searching and quickly found a position at Petco, where he ended up working for a few years and gained several promotions. Though working in retail was not his dream, Petco confirmed and encouraged Danny's passion for animals. In addition to supporting the start of Danny's career, Rachel also helped facilitate a

reconciliation between Danny and his adoptive mother, Lee. Danny showed great maturity and forgiveness in welcoming Lee and her husband back into his life despite the past hurt she caused him. Throughout their first couple years together, Danny and Rachel were already actively working to build their life and achieve their goals. They faced many obstacles and life events together, including Danny's father passing away due to an infection in December 2016 and Rachel's cousin passing away in February 2017 - but they had each other for support no matter what else was going on.

THOMPSON K9: A NEW CAREER CARING FOR CANINES

Danny and Rachel bought their first home together in March 2018. For many months, they worked to renovate and improve their new home while working their separate jobs. Once moved into the house, they welcomed their first puppy together into the family - which is what made Danny realize he wanted to be a dog trainer and ignited his passion. After completing Petco puppy classes and being left unsatisfied, Danny and Rachel ended up taking their puppy to K9 Heights in Madison Heights, MI as clients. Not long after, Danny left his position at Petco and was taken on by K9 Heights as an apprentice trainer. Working there, he was able to gain the knowledge and develop the skills he needed to become an excellent trainer, both from his dog training mentor and from other hired trainers. After his apprenticeship, which consisted of driving daily to Madison Heights and working

hourly, Danny transitioned to working from home and boarding dogs at his own house, responsible for the entirety of their care and training. Danny thrived as an independent trainer and was successful with every single dog and client he worked with, no matter the situation. Rachel encouraged and supported Danny's career pursuits every step of the way - financially supporting him during the initial career transition, allowing her house to be taken over by other people's dogs, etc. - and helped him with his board & train dogs as much as she could.

In 2019, Danny and Rachel began training with a dog sports club in Michigan, which built Danny's passion for working breed dogs in addition to pet dogs and expanded his dog knowledge greatly. This became Danny and Rachel's shared hobby and passion. On Christmas 2019, Danny proposed to Rachel (with the help of their dog, who Danny had trained to retrieve the ring), and they became engaged to be married (though they both always knew that was the direction they were headed in, this was when it finally became official).

COVID-19

When COVID-19 hit, Rachel started working from home in March 2020, which only strengthened Danny and Rachel's relationship further since it allowed them to spend more time together (though it did put wedding plans on hold). They continued training with their dogs, spending time with another dog sports group, and eventually added another working puppy to their family in late summer / early

fall 2020. In October 2020, they officially started their own dog training business together, Thompson K9 LLC. Danny is the head trainer and does wonders at transforming dogs' behaviors. Rachel operates the business side, and together they work directly with clients to help them achieve happy and peaceful lives with their dogs.

GIVING BACK TO THE COMMUNITY

Both with K9 Heights and now through Thompson K9, Danny has changed so many people's lives through the work he's done with their dogs. He has worked with aggressive dogs that owners were told to put down, dogs that had serious bite histories and were on doggy death row, dogs that were deemed "untrainable" by others, and more. Danny has been able to give these dog owners hope and peace again, has set these dogs up for happy and productive lives, and has provided so many owners with the knowledge and tools they need to prevent potential unsafe/dangerous situations with their dogs. Because of his passion and skill with dogs, these dogs and their owners (and anyone they encounter) are safer.

Danny and Rachel have also been working with a shelter, A ReJoyceful Animal Rescue, on a unique case. They have been training and fostering a dog for over 3 months that was dumped by her previous owner, had behavioral issues and a bite history, and was on track to be put down. Because of Thompson K9, this dog

not only gets to live - she gets to thrive and bring her next family joy. Her behavior and life trajectory were completely transformed thanks to Danny. Thompson K9 will continue to provide lifelong training support to this dog's new owners at no cost to them, to ensure her continued success (just as they provide lifelong support to all their regular clients).

Danny and Rachel's business has been thriving since they started it. They've been steadily busy, and every client has been completely satisfied and thoroughly impressed. Danny and Rachel do have goals of expanding the business over time so that they can help even more dogs and dog owners and offer other specialty training. Danny has already completed pet first aid training and become an AKC certified Canine Good Citizen evaluator, and he plans to continue his dog training education with further certifications and seminars/workshops.

One of their clients is a disabled veteran who has expressed his interesting in a lifelong relationship with Thompson K9, with the goal of training therapy dogs for other veterans (he has connections and contacts in this area). Danny has always had an interest in working with and helping veterans, since his own dad was a veteran and he saw the negative effects of that, and he is excited about the opportunity to help this unique community in this way.

Danny and Rachel have also been working with another dog trainer in multiple business pursuits. They have started their own dog sports club, the first

PSA club in the state of Michigan, and are well on their way to competing and earning titles on the club dogs. They have also been actively brainstorming and working towards forming a nonprofit in the future that would work to provide fully trained service, therapy, or sports dogs (as appropriate) to survivors of sexual assault and domestic violence, at no cost to the survivors. This would be another way for them to give back to the community in a way they are passionate about.

FUTURE PLANS

In addition to their dog-related goals, Danny and Rachel of course still have their personal life goals of getting married and starting their family. Their 6 years together has been a steady path of working towards and building their goal life together, first getting their home in line and then their careers. Eventually, Rachel plans to leave her job at the University of Michigan to focus fully on Thompson K9 and their family. Danny and Rachel have dreams and plans to buy a bigger property where they will build their own home and dog training facility, which would also more readily allow visits from family members (including siblings and nieces/nephews) and provide space to expand their own family.

3553 FACTORS

As we turn to the 3553 factors to determine punishment, we look at the following:

(A) to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense;

(B) to afford adequate deterrence to criminal conduct;

(C) to protect the public from further crimes of the defendant; and

(D) to provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner.

In Danny's case, he hired an attorney upon an investigation and counsel called the FBI to immediately let them know Danny would self-surrender if charges were brought. More importantly, Danny completely cooperated with AUSA Hank Moon and the authorities when asked for the weapon involved. Danny has worked with the authorities to make certain there were no issues or unneeded expense with his prosecution and has taken responsibility.

Danny Thompson is not a career felon. He is somebody that not only willingly accepted responsibility, he gives back to the community every single day. If the federal authorities had more prosecutions such as that of Danny Thompson, our world would be a safer place. Danny Thompson has been the model defendant. He has worked with probation, the government and never once considered forcing our Honorable Court to take the time for a trial. Even if there were aspects of this case to defend, Danny wanted to take responsibility.

CONCLUSION

Danny Thompson pleads with this court to give a probationary sentence. With the initial guidelines that were scored by the AUSA and the Defense, probation would be an appropriate sentence along with fines. Danny Jo Thompson is an asset to our community. He give back to our community in his business, he has overcome addiction and other than this isolated incident, he has put others first. For the reasons stated in this memorandum, we respectfully ask our Honorable Court to consider a sentence of 36 months of intensive probation.

Respectfully submitted,

Dated: 12/28/2021

/s/ William Amadeo

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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of December, 2021, I electronically filed the foregoing, SENTENCING MEMORANDUM with the Clerk of the Court using the ECF system which will automatically send notification of such filing to the following counsel of record:

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Dated: 12/28/2021

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